

# EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

**IN RE: DIGITEK PRODUCTS LIABILITY LITIGATION**

**MDL NO. 1968**

**THIS DOCUMENT RELATES TO ALL CASES**


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**DECLARATION OF FRED THOMPSON**

I, FRED THOMPSON, III, depose and say:

1. Since the original filing of Plaintiffs' Joint Petition for an Award of Attorneys' Fees and Expense Reimbursements on February 15, 2011, Motley Rice LLC has incurred additional expenses in the amount of \$42,000 for work by Plaintiffs' expert Russ Somma that was performed prior to the September 1, 2010 Settlement Agreement. These expenses would have been covered by the PSC treasury if there had been a second assessment. Thus, the MDL Expenses incurred by Motley Rice, LLC, on behalf of the PSC, giving all just credits, and adding all just debits, is \$232,301.78. The total amount of MDL expenses claimed by Motley Rice LLC to date, including held expenses, is \$414,997.98.

FURTHER AFFIANT SAYETH NOT.

  
Fred Thompson, III

Dated: April 21, 2011



# INVOICE

**Motley Rice LLC**  
**28 Bridgeside Blvd.**  
**Mt. Pleasant, SC 29464**

**Date:** 06/30/10  
**Invoice Number:** SOM10006-02

**P.O. No.:**

**Client Contact:** M. Johnson Carter

**Job Description:**  
**Expert Report and Deposition**

**Project No.:** SOM10006.01  
**Project Manager:** Russ Somma

	Cost
Monthly Retainer - May	10,000.00
<b>Subtotal:</b>	<b>10,000.00</b>

**Please remit payment to:**

**Total Due This Invoice:** \$10,000.00

**Sommatech, LLC**  
**2001 Joshua Road**  
**Lafayette Hill, PA 19444**  
**ATTN: Accounts Receivable**  
**P: 610.828.4090, F: 610.828.3656**

## ACCOUNT HISTORY

Previously Invoiced:	10,000.00
Total Invoiced To Date:	20,000.00
Total Paid To Date:	10,000.00
<b>PAST DUE AMOUNT:*</b>	<b>0.00</b>



# INVOICE

**Motley Rice LLC**  
**28 Bridgeside Blvd.**  
**Mt. Pleasant, SC 29464**

**Date: 06/30/10**  
**Invoice Number: SOM10006-03**

**P.O. No.:**

**Client Contact: M. Johnson Carter**

**Job Description:**  
**Expert Report and Deposition**

**Project No.: SOM10006.01**  
**Project Manager: Russ Somma**

	Cost
Monthly Retainer - June	10,000.00
<b>Subtotal:</b>	<b>10,000.00</b>

**Please remit payment to:**

**Total Due This Invoice: \$10,000.00**

**Sommatech, LLC**  
**2001 Joshua Road**  
**Lafayette Hill, PA 19444**  
**ATTN: Accounts Receivable**  
**P: 610.828.4090, F: 610.828.3656**

## ACCOUNT HISTORY

Previously Invoiced:	20,000.00
Total Invoiced To Date:	30,000.00
Total Paid To Date:	10,000.00



# INVOICE

**Motley Rice LLC**  
**28 Bridgeside Blvd.**  
**Mt. Pleasant, SC 29464**

**Date: 06/30/10**  
**Invoice Number: SOM10006-04**

**P.O. No.:**

**Client Contact: M. Johnson Carter**

**Job Description:**  
**Expert Report and Deposition**

**Project No.: SOM10006.01**  
**Project Manager: Russ Somma**

	Cost
Monthly Retainer - July	10,000.00
<b>Subtotal:</b>	<b>10,000.00</b>

**Please remit payment to:**

**Total Due This Invoice: \$10,000.00**

**Sommatech, LLC**  
**2001 Joshua Road**  
**Lafayette Hill, PA 19444**  
**ATTN: Accounts Receivable**  
**P: 610.828.4090, F: 610.828.3656**

## ACCOUNT HISTORY

Previously Invoiced:	30,000.00
Total Invoiced To Date:	40,000.00
Total Paid To Date:	10,000.00



# INVOICE

**Motley Rice LLC**  
**28 Bridgeside Blvd.**  
**Mt. Pleasant, SC 29464**

**Date: 08/10/10**  
**Invoice Number: SOM10006-05**

**P.O. No.:**

**Client Contact: M. Johnson Carter**

**Job Description:**  
**Expert Report and Deposition**

**Project No.: SOM10006.01**  
**Project Manager: Russ Somma**

	Cost
Monthly Retainer - August	12,000.00
<b>Subtotal:</b>	<b>12,000.00</b>

**Please remit payment to:**

**Total Due This Invoice: \$12,000.00**

**Sommatech, LLC**  
**2001 Joshua Road**  
**Lafayette Hill, PA 19444**  
**ATTN: Accounts Receivable**  
**P: 610.828.4090, F: 610.828.3656**

## ACCOUNT HISTORY

Previously Invoiced:	40,000.00
Total Invoiced To Date:	52,000.00
Total Paid To Date:	10,000.00